

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Periodic Reporting
(Proposal Two)

Docket No. RM2016-10

PUBLIC REPRESENTATIVE MOTION
FOR ISSUANCE OF INFORMATION REQUEST

(August 31, 2016)

Pursuant to Rules 39 C.F.R. §3001.21(a) and 39 C.F.R. §3007.3(c), the Public Representative requests that an Information Request be issued to obtain additional clarifying data and explanation from the Postal Service concerning its proposal to change analytical principles relating to the alignment of the ICRA methodology with the Cost and Revenue Analysis (CRA) methodology used for developing delivery costs.¹

Responses to the questions set forth below are intended to enhance understanding of Proposal Four so as to allow participants to provide more constructive comments and evaluate whether the proposal meets applicable legal and regulatory requirements. Obtaining this information will also contribute to a better understanding of how the Postal Service has interpreted Commission rules and allow the Commission to make a fully informed, reasoned determination on whether the Proposal Four meets applicable legal and regulatory requirements, including 39 U.S.C. §3622(c)(2).

¹ See Notice of Proposed Rulemaking on Analytical Principles Used in Periodic Reporting (Proposal Two), August 25, 2016, and Petition of the United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes In Analytical Principles ("Petition"), (August 22, 2016)

The Public Representative proposes the following questions, which pertain to USPS-RM2016-10-Prop.Two.NP1.Files-Inputs, File: ICRA15PRC-CARRIER-CARWASH.xlsx, Tabs: Colored Yellow, which show the proposed distributions of international delivery costs.

1. Please explain how the international attributable costs shown in the aforementioned workbooks were obtained before they were distributed to international products.
2. Were they obtained using methods the methods currently used in the ICRA?
3. Were they obtained using methods from the new domestic cost pools in which they will be combined?
4. If the answer to 3 is yes, please confirm that the variability of each cost pool (currently in the CRA) was derived, either directly or indirectly from econometric or engineering studies (e.g. the Rural Mail Count) which included international mail in their sample data.
5. Please confirm that attributable product collection costs are obtained by multiplying attributable collection costs by each product's share of RPW volume.
6. Please confirm that the evaluation factors for each item in worksheets 10.1.1 and 10.1.2, which were established observing the workload of rural carriers in the most recent Mail Count, included international mail.

Respectfully submitted,

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